

SHER TREMONTE LLP

April 18, 2025

VIA ECF

Hon. Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Rui-Siang Lin,*  
No. 24 Crim. 178 (CM)

Dear Judge McMahon:

We represent Rui-Siang Lin, the defendant in the above-referenced matter. We write on behalf of our client to respectfully request an adjournment of the sentencing date, currently scheduled for May 8, 2025. The reason for the adjournment is that the government recently advised that it has approximately one terabyte of material that it believed had been previously disclosed but, in fact, was not. We obtained a copy of the material earlier this week and have been working to get it into a reviewable format. The government is also currently working to convert the material into searchable form in order to facilitate our review. As the recently disclosed material may be relevant to sentencing, we need additional time to review it. Accordingly, we respectfully request that the Court adjourn sentencing by approximately sixty days. The government consents to this request.

We appreciate the Court's consideration.

Respectfully submitted,

/s/ Noam Biale

Noam Biale  
Michael Bass

*Attorneys for Rui-Siang Lin*

cc: AUSA Ryan Finkel (by ECF)  
AUSA Nick Chiuchiolo (by ECF)